

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY



1. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. This policy is issued by AMF Access Services Ltd (the Company), including branches/filialer, having regard to the terms of the Modern Slavery Act 2015.

Modern slavery takes various forms and includes:

- (a) Slavery where someone behaves as if he or she “owns” another person who deprives the person of freedom,
- (b) Servitude which is imposing the obligation to provide services by coercion which includes living on someone else’s property and the impossibility of changing one’s condition,
- (c) Forced and compulsory labour where work is exacted from someone by some form of menace, where there may be direct threats of violence or other compulsion and where the service is not given voluntarily; and
- (d) Human trafficking where someone arranges or facilitates the travel of another person with a view to that person being exploited.

All the above involves the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships. We aim to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, in accordance with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes we do include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all Company locations, including branches/filialer of AMF Access Services Ltd. It is applicable to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the Policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance manager.

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3. Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your supervisor, the operations manager or the Human Resources Department as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You may also report suspected modern slavery to the Modern Slavery Helpline operated by the government on 0800 0121 700. You may also report a specific case of modern slavery to the police on 101. If potential victims are in immediate danger the standard emergency number 999 should be used.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you are encouraged to raise it with your manager or the Compliance Representatives as soon as possible.

If you believe or suspect a breach of this policy has occurred or that it may occur whether within the Company or at one of our suppliers you must notify your manager or the Compliance Representatives or report it in accordance with our Whistleblowing Policy as soon as possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Company intranet.

4. Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.